

# National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111 FAX 703-841-9328

Agri-Mark, Inc.  
Arkansas Dairy Cooperative Association  
Associated Milk Producers, Inc.  
California Dairies, Inc.  
Cass-Clay Creamery, Inc.  
Continental Dairy Products, Inc.  
Cooperative Milk Producers Assn.  
Dairy Farmers of America, Inc.  
Dairymen's Marketing Cooperative, Inc.  
Dairylea Cooperative Inc.  
Ellsworth Cooperative Creamery  
Farmers Cooperative Creamery  
First District Association  
Foremost Farms USA  
Just Jersey Cooperative, Inc.  
Land O'Lakes, Inc.  
Lone Star Milk Producers, Inc.  
Manitowoc Milk Producers Coop.  
MD & VA Milk Producers Cooperative Association, Inc.  
Michigan Milk Producers Assn.  
Mid-West Dairymen's Company  
Niagara Milk Cooperative, Inc.  
Northwest Dairy Association  
Prairie Farms Dairy, Inc.  
St. Albans Cooperative Creamery, Inc.  
Scioto County Co-op Milk Producers' Assn.  
Select Milk Producers, Inc.  
Southeast Milk, Inc.  
Swiss Valley Farms, Co.  
Tillamook County Creamery Assn.  
United Dairymen of Arizona  
Upstate Farms Cooperative Inc.  
Zia Milk Producers

December 23, 2005

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

RE: Docket No. 2000P-1491

Dear Sir/Madam:

The following comments are being submitted on behalf of the National Milk Producers Federation (NMPF) to FDA's Advanced Notice of Proposed Rulemaking; Petition Amend Standards for Parmesan and Reggiano Cheese (Docket No. 2000P-1491). NMPF, headquartered in Arlington, VA, develops and carries out policies that advance the well-being of U.S. dairy producers and the cooperatives they collectively own. The members of NMPF's 33 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of 50,000 dairy producers on Capitol Hill and with government agencies. NMPF member cooperatives also manufacture a number of dairy products regulated by FDA, including milk, cheese, ice cream, and butter, so this advanced notice to proposed rulemaking (ANPR) to amend the parmesan and reggiano cheese standard is of great interest to NMPF.

Specifically, FDA requested comments on two topics for amending the parmesan and reggiano cheese standard. NMPF has reviewed the entire ANPR and will provide comment on each topic for which comments were requested.

*(1) Whether the proposed amendment will affect the basic nature, organoleptical, safety or physical properties of parmesan cheese.*

Standards of identity serve as the "gold standard" for consumer confidence in food products. NMPF believes that a standard of identity best serves consumer interests when a product manufactured according to the provisions of that standard consistently meets consumers' expectations in terms of sensory fulfillment and nutritional value. In other words, a standard of identity should preserve the integrity of that product by delivering the attributes the consumer associates with the name of the food each and every time the product is purchased. Consequently, standards provisions related to product quality are particularly critical since they have such a significant impact on sensory fulfillment. NMPF is supportive of amending the parmesan and

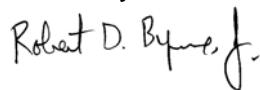
reggiano cheese standard by reducing the aging requirement from ten (10) to six (6) months if the product still meets consumers' expectations in terms of sensory fulfillment and nutritional value. The product aged six (6) months should also be essentially the same as the product that is aged ten (10) months.

*(2) Whether this change will reduce cost barriers to entry into the marketplace.*

At this time NMPF cannot determine whether the amending the parmesan and reggiano cheese standard by reducing the aging requirement from ten (10) to six (6) months will reduce cost barriers to entry into the marketplace. In fact, NMPF is not aware of any cost barriers associated with the current aging requirement.

Thank you for the opportunity to provide these comments. If you have any questions or need additional information, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Robert D. Byrne, Jr." with a stylized flourish at the end.

Robert D. Byrne, Ph.D.  
Vice President, Scientific and Regulatory Affairs